

201-15736

December 18, 2004

USPS Certified Mail, Return Receipt Requested

Mr. Mike Leavitt, Administrator
US Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116
Attention: Chemical Right-to-Know Program

RECEIVED
OPPT NCIC
04 DEC 21 PM 12:56

Attn: Chemical Right-To-Known Program
Re: HPV Challenge
2-Ethylhexyl Diphenyl Phosphate
CAS Registry Number 1241-94-7

Dear Administrator Leavitt:

As part of Ferro Corporation's commitment under EPA's High Production Volume (HPV) Challenge Program, Ferro is pleased to submit its revised testing approach for 2-Ethylhexyl Diphenyl Phosphate. This submission consists of this cover letter, a Test Plan, and robust summaries for the existing studies available on 2-Ethylhexyl Diphenyl Phosphate. This submission is also being sent electronically to the following e-mail addresses:

oppt.ncic@epa.gov
chem.rtk@epa.gov

Ferro appreciates the assistance from USEPA for locating and providing copies of a number of studies on this chemical. This has allowed us to assemble a collection of studies that covers all toxicological HVP tests for 2-Ethylhexyl Diphenyl Phosphate. Thus, we propose no further toxicology testing, and only one physical chemistry test on 2-Ethylhexyl Diphenyl Phosphate.

Ferro understands that this submission will be posted on the Internet. In the event that additional information on existing studies of 2-Ethylhexyl Diphenyl Phosphate, Ferro may wish to amend its submission. Thank you for your cooperation in this matter. If EPA requires any additional information about this submission, please contact me at 216-750-6696 or olsona@ferro.com.

Sincerely,

Alan J. Olson, P.E
Director of Technology
Ferro Performance Chemicals Group